

## **PART II: Survey Introduction**

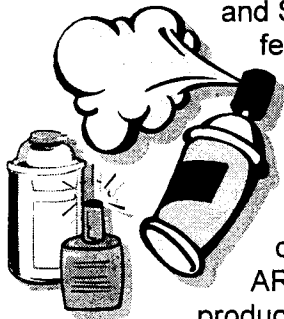
## OVERVIEW

This section provides background about how the 2003 Consumer & Commercial Products Survey (survey) relates to the Consumer Products Program and the purpose and goals of the survey.

### Background

The information requested in this survey is made pursuant to sections 39600, 39607, 39701, and 41511 of the California Health and Safety Code (HSC), and sections 91100 and 94513, Title 17, of the California Code of Regulations (CCR). These sections authorize the California Air Resources Board (ARB, Board) to require the submission of information needed by the Board to estimate atmospheric emissions and to carry out its other statutory duties. Associated laws and regulations may be found at the following website: [www.arb.ca.gov/html/lawsregs.htm](http://www.arb.ca.gov/html/lawsregs.htm).

The Consumer Products Program is an important part of the ARB's overall effort to reduce emissions from the use of consumer products in homes and institutions. Section 41712 of the California Health and Safety Code requires the ARB to adopt regulations that achieve the maximum feasible reduction in *volatile organic compound (VOC)* emissions from consumer products. VOCs that are emitted from consumer products react with other pollutants in the presence of sunlight to form ground-level ozone and particulate matter, which are the main ingredients of smog.



California's State Implementation Plan (SIP) for ozone serves as California's overall long-term plan for attainment of the federal ozone standards. In the SIP, the ARB has committed to achieving significant emission reductions from consumer products. To help achieve these reductions, VOC standards have been developed for about 100 consumer product categories, which have resulted in considerable reductions of emissions from consumer products during the last ten years. However, after the latest standards are implemented, emissions will begin to increase from consumer products due to population growth. Therefore, additional control measures are necessary so that this emissions growth will not overtake the reductions already achieved. As part of the regulatory process, the ARB must determine that adequate data exists to adopt regulations. This survey is a primary step in gathering the data. Additionally, section 41712(c) of the California Health and Safety Code stipulates that no regulation shall be adopted which requires the elimination of a product form.

### Purpose & Goals

The purpose of this survey is to gather current information on *volatile organic compound (VOC)* emissions from consumer and commercial product categories. The survey has two goals: first, to update our consumer products emissions inventory; and second, to assist us in determining the feasibility of further reducing consumer products emissions. Please note that all categories surveyed will not necessarily be regulated; regulation will occur only in cases where new VOC limits are determined to be commercially and technologically feasible.

**Purpose: to gather current information on VOC emissions from consumer product categories**

## SURVEY DEVELOPMENT

The following section provides information about how the survey was developed and describes how this survey differs from the last survey, the 2001 Consumer and Commercial Products Survey (2001 Survey).

### Workgroup Formed

The ARB sent over 3,500 invitation letters to potential consumer product stakeholders to help establish the 2003 Survey Stakeholder Workgroup (Workgroup), a subcommittee of the Consumer Products Workgroup. The Workgroup served as a forum for on-going communication between the ARB and stakeholders regarding the development of the survey.

Ultimately, over 70 stakeholders, including representatives from industry, environmental groups, concerned citizens, and government agencies, actively participated in the development of this survey.

**Over 70 stakeholders helped the ARB develop this survey.**

Two Workgroup meetings were held and were open to the public. They were announced via the Workgroup mailing list and the consumer product list-server. The meetings offered participation by teleconference or in-person and written comments were taken in the weeks following each meeting. The Workgroup meetings were held as follows:

- **August 25, 2004** – This initial meeting introduced the ARB Consumer Products Program, the goals of the 2003 survey, and the expected timeline for the survey process. The draft comprehensive list of survey categories was released one week before the meeting. Along with the survey categories, proposed changes to the survey forms (since the 2001 survey) were presented and discussed.
- **September 30, 2004** – ARB released a preliminary draft of the 2003 Survey approximately one week before the meeting. A revised list of proposed survey categories was also released, based on comments from the previous meeting. ARB staff reviewed comments from the August 25<sup>th</sup> meeting and discussed the draft survey packet, including identification of the proposed changes to the survey forms since the 2001 Survey. Stakeholders provided comments concerning the revised survey category list and the draft survey packet.

We would like to thank Workgroup participants that assisted us over the last several months in developing this survey. Special thanks to the Cosmetic, Toiletry, and Fragrance Association (CTFA), Consumer Specialty Products Association (CSPA), International Sanitary Supply Association, Inc. (ISSA), National Paint & Coatings Association (NPCA), and the Automotive Specialty Products Alliance (ASPA). We also want to thank the numerous individuals not specifically listed here that provided valuable insight and comments during the survey development process. The survey, which has been greatly improved as a result of input from the Workgroup, reflects those considerations.

## Updates Since the 2001 Survey

This survey was developed using the ARB 2001 Consumer & Commercial Products Survey (2001 Survey) as a starting point. Following is a list of updates since the last survey and some notes of clarification.

### Updates:

- **Comprehensive Category List.** *First survey on this scale performed by ARB; see Attachment A*
- **List of Low Vapor Pressure VOCs (LVP-VOCs) to be Individually Reported.** *List helps determine which LVP-VOCs to list individually on FORM 4; see Attachment E*
- **Hydrocarbon Solvent Information.** *Contains samples of trade names and bin numbers to assist in completion of FORM 4; see Attachment F*
- **Addition of Specific Ingredients.** *Aminomethylpropanol (AMP), HFC-134a, and HCFC-141b; see FORM 4*
- **Product "forms" Question Revised.** *Designed to capture more detail about packaging methods and dispensed product forms; see FORM 3*
- **Reporting of Sales Data.** *Sales to be reported by number of units; "method" of data collection added; reporting of filled product, including "overfill" added; clarification in instructions that internet sales must be reported; see FORM 3*
- **Resin/polymer/film-forming compounds.** *Addition of "Does this product contain a resin, polymer, or other film-forming compound?" question; see FORM 3*
- **Special Reporting Requirements for Aerosol Adhesives.** *Supplement to the survey that applies to Aerosol Adhesives only; fulfills special reporting requirements for Aerosol Adhesives; see Part VIII of the survey*
- **Certification, Authorized Signature.** *Signature required from management level, authorized representative; see FORM 1*
- **Electronic Version of Survey and Various Instructions for Formulators.** *For formulating companies submitting ingredient information on behalf of a responsible party, there is now the option to use an electronic version of FORM 4; throughout the survey packet, instructions specific to formulators have been added; see page III-2*
- **CAS list posted to survey website.** *For those unable to obtain the Chemical Abstract Service (CAS) number for an ingredient from their supplier, they can visit the survey website ([www.arb.ca.gov/consprod/regact/2003surv/2003surv.htm](http://www.arb.ca.gov/consprod/regact/2003surv/2003surv.htm)) for links to the ARB's Consumer Products CAS list. See page III-11 for other chemistry websites.*

### Notes of Clarification:

- **Product group criteria:** *products with two percent or more variation in VOC content cannot be grouped; formulas must be examined carefully prior to grouping, especially products with multiple shades (e.g. nail coatings); grouping by herbal/botanical extracts is acceptable if products also meet other grouping criteria.*
- **Reporting is mandatory:** *responsible parties, formulators, and any other company holding data requested by the survey are required by law to report.*